

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 2:22-cv-203-JRG
)	
MICRON TECHNOLOGY, INC.;)	JURY TRIAL DEMANDED
MICRON SEMICONDUCTOR)	
PRODUCTS, INC.; MICRON)	
TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	

DECLARATION OF JASON G. SHEASBY IN SUPPORT OF
NETLIST, INC.'S MOTION FOR AN ORDER TO SHOW CAUSE WHY
EVIDENTIARY SANCTIONS RELATING TO THE '060 AND '160 PATENTS
SHOULD NOT BE ISSUED ON DEFENDANTS

I, Jason G. Sheasby, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist Inc.’s Motion For An Order to Show Cause Why Evidentiary Sanctions Relating to the ’060 and ’160 Patents Should Not Be Issued on Defendants. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct copy of the November 10, 2022 letter from Yanan Zhao to Michael Rueckheim.

3. Attached as **Exhibit 2** is a true and correct copy of the April 29, 2023 letter from Michael Tezyan to Michael Rueckheim.

4. Attached as **Exhibit 3** is a true and correct copy of an email chain between counsel for Netlist and counsel for Micron dated between July 31, 2023 and August 8, 2023.

5. Attached as **Exhibit 4** is a true and correct copy of the August 29, 2023 letter from Liberty Quan to Thomas Werner.

6. Attached as **Exhibit 5** is a true and correct copy of the September 5, 2023 email from Counsel for Micron to Counsel for Netlist.

7. Attached as **Exhibit 6** is a true and correct copy of an email chain between counsel for Netlist and counsel for Micron, dated between September 12 and September 15, 2023.

8. Attached as **Exhibit 7** is a true and correct copy of an email chain between counsel for Netlist and counsel for Micron dated between August 17 and September 15, 2023.

9. Attached as **Exhibit 8** a true and correct copy of an email chain between counsel for Netlist and counsel for Micron dated between September 13 and September 14,

2023.

10. Attached as **Exhibit 9** is a true and correct copy of the attachment to the September 15, 2023 email from Tom Werner to Ryuk Park contained in Exhibit 8.

11. Attached as **Exhibit 10** is a true and correct copy of an email chain between counsel for Netlist and counsel for Micron dated between September 12 and September 14, 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 16, 2023, in Los Angeles, California.

By /s/ Jason G. Sheasby
Jason G. Sheasby